



FRANK & ASSOCIATES, P.C.
THE WORKPLACE LAW FIRM

NEIL M. FRANK, ESQ.

July 29, 2015

VIA ECF

Hon. Arthur D. Spatt
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ AUG 04 2015 ★
LONG ISLAND OFFICE

RE: *Henriquez v. Kelco Landscaping Inc. et al.*
12-CV-6233 (ADS) (GRB)

Dear Judge Spatt:

This firm represents Plaintiffs in the above referenced matter. I regret to inform the Court, as a result of the failure of this office to properly track the due date for the Motion for Final Approval in the above-referenced case due July 15, 2015, and we must request an enlargement of the due date until 5, 2015.

I have no excuse for this failure, but would like to explain. Approximately one month ago, both the partner and associate responsible for the case resigned from the firm. In the "perfect storm" of problems which then occurred, the firm's computer system was infected with a virus which destroyed our ability to track the deadline for the filing due in this case. To compound the error, my former partner has been on his honeymoon for more than two weeks so I could not reach him. He returned today, and was not able to clarify why the error occurred.

For the reasons stated above, I respectfully request an extension of time to file the above referenced motion to no later than August 5, 2015.

Respectfully submitted,

FRANK & ASSOCIATES, P.C.

Neil M. Frank

REQUEST GRANTED. Counsel is directed to the Court's Individual Rule I.F, which requires requests for extensions of time to indicate, inter alia, whether the movant's adversary consents to the request. In the future, papers that fail to comply with applicable rules will be rejected.

s/ Arthur D. Spatt

Arthur D. Spatt, U.S.D.J.

8/4/15